UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

LATOYA HARDNEY, individually and as)
Administrator of the Estate of)
KENNETH T. SHARP, Deceased.)
Plaintiff,)
v.	Civil Action No.: 3:25-cv-24
CITY OF RICHMOND, et al.,)
Defendants.)

<u>DEFENDANT CITY OF RICHMOND'S</u> <u>MOTION TO DISMISS PURSUANT TO RULE 12(b)(6)</u>

Comes now the Defendant City of Richmond ("City"), by counsel, and pursuant to Federal Rule of Civil Procedure 12(b)(6), respectfully moves this Court to dismiss this action against the City. A Memorandum in Support is filed with this Motion.

Date: March 18, 2025 Respectfully Submitted,

By: /s/

Deputy City Attorney Rhanelle E. Collins-Meredith, Esquire (VSB #72099)

Wirt P. Marks, Esquire (VSB #36770)

Assistant City Attorney

Assistant City Attorney

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Counsel for Defendant City of Richmond

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of March, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice of said filing to all counsel of record.

Wirt P. Marks, Esquire (VSB #36770)

Deputy City Attorney

Rhanelle E. Collins-Meredith, Esquire (VSB #72099)

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